UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND (PROVIDENCE)

GEORGE GUINDON, ET AL. Plaintiffs,	§ § § §	
v.	§	Civil Action No. 03-335L
AMERICAN FOAM CORP., ET AL. Defendants.	§ § § § §	Judge: Ronald R. Lagueux

ANSWER OF DEFENDANTS[1] TO PLAINTIFFS'[2] NOTICE OF ADOPTION OF THIRD AMENDED MASTER COMPLAINT, SUBJECT TO DEFENDANTS'[3] NOTICE OF ELECTION AS TO MOTION TO DISMISS, AND ADOPTING AND SUBJECT TO DEFENDANTS'[4] PARTIAL MOTION TO DISMISS THIRD AMENDED MASTER COMPLAINT

TO THE HONORABLE COURT:

BRIAN BUTLER (the 24th listed Defendant in the above-referenced action, hereinafter "BUTLER" or "Defendant"); TVL BROADCASTING, INC. (the 25th listed Defendant in the above-referenced action, hereinafter "TVL" or "Defendant"); STC BROADCASTING, INC. (the 26th listed Defendant in the above-referenced action, hereinafter "STC" or "Defendant"); TVL BROADCASTING OF RHODE ISLAND, LLC (the 79th listed Defendant in the above-referenced action, hereinafter "TVL RHODE ISLAND" or "Defendant"); LIN TELEVISION CORPORATION (the 80th listed Defendant in the above-referenced action, hereinafter "LIN" or "Defendant"); and LIN TV Corp. (the 81st listed Defendant in the above-referenced action, hereinafter "LIN TV" or "Defendant") (collectively, "Defendants") respectfully file this Answer to Plaintiffs'[5] Notice of Adoption of Third Amended Master Complaint, Subject to Defendants'[6] Notice of Election as to Motion to Dismiss, and Adopting and Subject to Defendants'[7] Partial Motion to Dismiss Third Amended Master Complaint, as follows:

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[1] Brian Butler; TVL Broadcasting, Inc.; STC Broadcasting, Inc.; LIN Television Corporation; LIN TV Corp.; and TVL Broadcasting of Rhode Island, LLC.

[2] All Plaintiffs in *Guindon, et al. v. American Foam Corp., et al.*; C.A. No. 03-335L.

[3] TVL Broadcasting, Inc.; STC Broadcasting, Inc.; LIN Television Corporation; LIN TV Corp.; and TVL Broadcasting of Rhode Island, LLC.

[4] LIN Television Corporation; LIN TV Corp.; and TVL Broadcasting of Rhode Island, LLC.

All Defendants here incorporate by reference herein the "Answer of Defendants to Plaintiffs' Third Amended Master Complaint, Subject to Defendants' Notice of Election as to Motion to Dismiss, and Adopting and Subject to Defendants' Partial Motion to Dismiss Plaintiffs' Third Amended Master Complaint" filed on or about March 17, 2006 in *Gray, et al. v. Derderian, et al.*; C.A. No. 04-312L as their answer here.

In addition, all Defendants here incorporate by reference herein the "Answer of Brian Butler, TVL Broadcasting, Inc., and STC Broadcasting, Inc. to Plaintiffs' Notice of Adoption of First Amended Master Complaint Subject to TVL's and STC's Partial Motion to Dismiss" filed on February 4, 2005 in *Guindon, et al. v. American Foam Corp., et al.*, C.A. No. 03-335L.

In addition, Defendants[8] incorporate by reference herein "Defendants' Notice of Election as to Motion to Dismiss." (see PACER Doc. No. 700).

In addition, Defendants TVL Rhode Island, LIN, and LIN TV incorporate by reference herein their previously filed motion and memorandum of law titled "LIN Television Corporation, TVL Broadcasting of Rhode Island, LLC and LIN TV Corp.'s Partial Motion to Dismiss Third Amended Master Complaint," and "LIN Television Corporation, TVL Broadcasting of Rhode Island, LLC and LIN TV Corp.'s Memorandum of Law in Support of Their Partial Motion to Dismiss," respectively. (see PACER Doc. No. 704).

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[5] *See* n. 2.
[6] *See* n. 3.
[7] *See* n. 4.
[8] *See* n. 3.

Respectfully submitted,

Defendants BRIAN BUTLER;
TVL BROADCASTING, INC.;
STC BROADCASTING, INC.;
TVL BROADCASTING OF RHODE ISLAND, LLC; LIN TELEVISION CORPORATION; and LIN TV Corp., by their Attorneys,

Charles L. Babcock
Nancy W. Hamilton
Earl H. Walker
JACKSON WALKER L.L.P.
1401 McKinney, Suite 1900
Houston, Texas 77010
(713) 752-4200 – Telephone
(713) 752-4221 – Fax

DATED: 3/17/06

Richard W. MacAdams, #1681
Denean M. Russo, #5043
MacADAMS & WIECK INC.
101 Dyer Street, Suite 400
Providence, RI 02903
(401) 454-8700 - Telephone
(401) 454-8755 – Fax

CERTIFICATE OF SERVICE

This is to certify that on this 17th day of March, 2006, a true and correct copy of Answer of Defendants to Plaintiffs' Notice of Adoption of Third Amended Master Complaint, Subject to Defendants' Notice of Election as to Motion to Dismiss, and Adopting and Subject to Defendants' Partial Motion to Dismiss Third Amended Master Complaint was served via email in PDF format only, upon:

Allen J. McCarthy	stationlitigation@melicklaw.com
Andrew Trevelise	atrevelise@reedsmith.com
Ann M. Songer/George Wolf	asonger@shb.com
Anthony F. DeMarco/Mark Reynolds	tdemarco@conversent.net
Brian R. Cunha/Karen Alegria	Brian@Briancunha.com
Bruce Keller/Michael Potenza	bpkeller@debevoise.com
C. Russell Bengtson	RBengtson@ckmlaw.com
Charles L. Babcock	cbabcock@jw.com
Charles N. Redihan, Jr.	credihan@KPRlaw.com
Christopher C. Fallon, Jr.	cfallon@cozen.com
Curtis R. Diedrich	cdiedrich@sloanewalsh.com
Daniel J. Horgan	horganlaw@snet.net
Donald J. Maroney/James Reilly	dmaroney@kkrs.com
Edward M. Crane/Deborah Solmor	ecrane@skadden.com
Edward T. Hinchey/James Scanlon	EHinchey@sloanewalsh.com
Edwin F. McPherson	emcpherson@m-klaw.com
Esquire Litigation Solutions, LLC	stationfire@esquirecom.com
Eva Marie Mancuso	Emancuso@hwac.com
Fred Kelly, Jr./Steven M. Richard	StationFireLitigation@nixonpeabody.com
Georgia M. Sullivan	Georgia.Sullivan@thehartford.com
Howard A. Merten/Benjamin White	Hmerten.station@psh.com
Howard J. Julian	sohohomes@yahoo.com
James A. Bigos	jim@b-plaw.com
James A. Ruggieri	JRuggieri@hcc-law.com
James J. Restivo, Jr./W. Thomas McGough	jrestivo@reedsmith.com
James R. Lee	JLee@riag.state.ri.us
James T. Murphy/Kelly Michels	stationfire@hansoncurran.com
Jessica Deanseris/Max Wistow/John Barylick	jdean@wistbar.com
John J. Nazzaro	nazzjn@aol.com
John R. Mahoney	john.mahoney@amlawllp.com
Joseph B. Burns	jburns@rms-law.com
Joseph Krowski	josephkrowski.law@verizon.net
Joseph V. Cavanagh, Jr./Kristen Rodgers	stationfire@blishcavlaw.com
Kate Breslin-Harden/J. Renn Olenn	KBH@olenn-penza.com

Lawrence J. Cappuccio	l.cappuccio@worldnet.att.net
Marc DeSisto	stationfire@desistolaw.com
Mark C. Hadden	MHadden@mhaddenlaw.com
Mark D. Cahill/Eric B. Hermanson	mcahill@choate.com
Mark P. Dolan/Anthony Leone	Ricedolank@aol.com
Mark S. Mandell	msmandell@msn.com
Mark T. Nugent/Paul Sullivan	mnugent@morrisonmahoney.com
Mark Tourgee/Timothy Williamson	aminchillo@itwlaw.com
Matthew F. Medeiros	mfm@lmkbw.com
Michael DeLuca	mrd@gsm-law.com
Michael A. St. Pierre	mikesp@rrsplaw.com
Patrick T. Jones/Peter Schneider	pjones@cmj-law.com
Ralph J. Monaco/Patrick Day	rmonaco.c-l@snet.net
Richard W. MacAdams	Rmacadams@mandwlaw.com
Robert Reardon	Reardonlaw@aol.com
Robert T. Norton	rnorton@sloanewalsh.com
Ronald J. Resmini/Ronald Creamer	Resminilaw@yahoo.com
Ronald Langlois/Lauren Wilkens	stationfire@smithbrink.com
Russell Bramley	bramley@hbhlaw.net
Scott J. Tucker	STucker@ths-law.com
Stephanie DiMaio Larivee	fonia@msn.com
Stephen A. Izzi	Stephen.Izzi@hklaw.com
Stephen E. Breggia/Kevin Bowen	sbreggia@BBGlaw.us
Stephen M. Prignano/Stephen MacGillivray	sprignano@eapdlaw.com
Stephen P. Fogerty	fogerty@halloran-sage.com
Steven A. Minicucci/William Filippo	SMinicucci@calvinolaw.com
Susan S. Wettle/Carl Henlein/John Crockett	swettle@fbtlaw.com
Suzanne O'Donoghue	sodonoghue@hcc-law.com
T. Dos Urbanski/Michael J. Mazurczak	stationlitigation@melicklaw.com
Thomas C. Angelone	Angelonelaw@aol.com
Thomas W. Lyons	tlyons@straussfactor.com

Denean M. Russo

Richard W. MacAdams
Denean M. Russo

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